

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

EXPERIENCE, INC.

Plaintiff

v.

CSO RESEARCH, INC.

Defendant

Civil Action No. 04-11127-JLT
(Magistrate Judge Collings)

UNOPPOSED MOTION TO ADMIT COUNSEL *PRO HAC VICE*

The undersigned, Erik Paul Belt, a member of the bar of this Court, moves pursuant to Local Rule 83.5.3(b) for the admission *pro hac vice* of Beverly G. Reeves and Paul Schlaud, both of the law firm Reeves & Brightwell LLP of Austin, Texas. Attorneys Reeves and Schlaud will represent the defendant, CSO Research, Inc.

As stated in the accompanying certificates (attached as Exhibits A and B respectively), Attorneys Reeves and Schlaud are both members of the Bar of the State of Texas. Attorney Reeves is also a member of the bar of the Texas Supreme Court, the United States District Court for the Western District of Texas, and the Fifth Circuit Court of Appeals. Attorney Schlaud is also a member of the bar of the United States District Court for the Western District of Texas, the United States District Court for the Southern District of Texas, and the Fifth Circuit Court of Appeals. They are both in good standing in every jurisdiction in which they have been admitted to practice. Also, there are no disciplinary proceedings pending against them as members of the bar in any jurisdiction, court,

or agency. Attorneys Reeves and Schlaud both declare that they are familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Erik Paul Belt, partner in the Boston law firm Bromberg & Sunstein LLP, is also appearing in this action on behalf of CSO Research, Inc., and will continue to represent CSO as local counsel. Mr. Belt is a member in good standing of the bar of this Court.

The required admission fee for appearing *pro hac vice* (\$50.00 for each attorney, or \$100.00 total) is being sent by hand delivery contemporaneously with the e-filing of this motion.

Plaintiff does not oppose the admission of Attorneys Reeves and Schlaud.

ACCORDINGLY, Erik Paul Belt respectfully requests that Beverly G. Reeves and Paul Schlaud be admitted to the bar of this Court for purposes of the above-captioned action.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that, on June 14, 2004, I conferred by telephone with counsel for the plaintiff, Michael R. Gottfried, in a good faith attempt to resolve or narrow the issues presented by this motion.

Mr. Gottfried stated that Plaintiff does not oppose the admission of Attorneys Reeves and Schlaud.

Dated: June 14, 2004

Respectfully submitted,

/s/ Erik P. Belt

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